

EXHIBIT “A”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL HARRIS, Individually and as	:	
the Administrator of the ESTATE of	:	
QUINCY DAY-HARRIS	:	
46 Anderson Court	:	
Bear, DE 19701	:	
	Plaintiff	Docket No.:
v.	:	
	:	
CITY OF PHILADELPHIA	:	
1515 Arch Street	:	
Philadelphia, PA 19102	:	JURY TRIAL DEMANDED
	:	
and	:	
	:	
PRISON COMMISSIONER BLANCHE	:	
CARNEY	:	
Philadelphia Department of Prisons	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
WARDEN MICHELE FARRELL	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
SERGEANT JEFFREY BISHOP	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
CORRECTIONAL OFFICER JORDAN	:	
HARRIS	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	

and :
CORRECTIONAL OFFICER ANDREW :
MENDES :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CORRECTIONAL OFFICERS :
JOHN/JANE DOES (1-10) (Fictitious) :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CENTURION HEALTH :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
MHM SERVICES, INC. :
1593 Spring Hill Rd., Suite 600 :
Vienna, VA 22182 :
and :
AMY FISHER, LSW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
KYERSTYN O'HARA, SW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
:

JILL REGALBUTO, LSW	:
a/k/a Jill Harris	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
and	:
	:
MEDICAL PROVIDERS JOHN/JANE	:
DOES (1-10) (fictitious)	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:

Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, CENTURION HEALTH**

I, Todd A. Schoenhaus, Esquire, certify that:

X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

X the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

 expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
NANCY J. WINKLER, ESQUIRE
TODD A. SCHOENHAUS, ESQUIRE
1634 Spruce Street
Philadelphia, PA 19103
(215) 546-6636
(215) 546-3641 fax
Attorneys for Plaintiff

Dated: August 21, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL HARRIS, Individually and as	:	
the Administrator of the ESTATE of	:	
QUINCY DAY-HARRIS	:	
46 Anderson Court	:	
Bear, DE 19701	:	
	Plaintiff	Docket No.:
v.	:	
	:	
CITY OF PHILADELPHIA	:	
1515 Arch Street	:	
Philadelphia, PA 19102	:	JURY TRIAL DEMANDED
	:	
and	:	
	:	
PRISON COMMISSIONER BLANCHE	:	
CARNEY	:	
Philadelphia Department of Prisons	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
WARDEN MICHELE FARRELL	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
SERGEANT JEFFREY BISHOP	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
CORRECTIONAL OFFICER JORDAN	:	
HARRIS	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	

and :
CORRECTIONAL OFFICER ANDREW :
MENDES :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CORRECTIONAL OFFICERS :
JOHN/JANE DOES (1-10) (Fictitious) :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CENTURION HEALTH :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
MHM SERVICES, INC. :
1593 Spring Hill Rd., Suite 600 :
Vienna, VA 22182 :
and :
AMY FISHER, LSW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
KYERSTYN O'HARA, SW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
:

JILL REGALBUTO, LSW	:
a/k/a Jill Harris	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
and	:
	:
MEDICAL PROVIDERS JOHN/JANE	:
DOES (1-10) (fictitious)	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:

Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, MHM SERVICES, INC.**

I, Todd A. Schoenhaus, Esquire, certify that:

X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

X the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

 expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
NANCY J. WINKLER, ESQUIRE
TODD A. SCHOENHAUS, ESQUIRE
1634 Spruce Street
Philadelphia, PA 19103
(215) 546-6636
(215) 546-3641 fax
Attorneys for Plaintiff

Dated: August 21, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL HARRIS, Individually and as	:	
the Administrator of the ESTATE of	:	
QUINCY DAY-HARRIS	:	
46 Anderson Court	:	
Bear, DE 19701	:	
	Plaintiff	Docket No.:
v.	:	
	:	
CITY OF PHILADELPHIA	:	
1515 Arch Street	:	
Philadelphia, PA 19102	:	JURY TRIAL DEMANDED
	:	
and	:	
	:	
PRISON COMMISSIONER BLANCHE	:	
CARNEY	:	
Philadelphia Department of Prisons	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
WARDEN MICHELE FARRELL	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
SERGEANT JEFFREY BISHOP	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
CORRECTIONAL OFFICER JORDAN	:	
HARRIS	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	

and :
CORRECTIONAL OFFICER ANDREW :
MENDES :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CORRECTIONAL OFFICERS :
JOHN/JANE DOES (1-10) (Fictitious) :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CENTURION HEALTH :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
MHM SERVICES, INC. :
1593 Spring Hill Rd., Suite 600 :
Vienna, VA 22182 :
and :
AMY FISHER, LSW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
KYSERSTYN O'HARA, SW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
:

JILL REGALBUTO, LSW	:
a/k/a Jill Harris	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
and	:
	:
MEDICAL PROVIDERS JOHN/JANE	:
DOES (1-10) (fictitious)	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:

Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, AMY FISHER, LSW**

I, Todd A. Schoenhaus, Esquire, certify that:

X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

 expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
NANCY J. WINKLER, ESQUIRE
TODD A. SCHOENHAUS, ESQUIRE
1634 Spruce Street
Philadelphia, PA 19103
(215) 546-6636
(215) 546-3641 fax
Attorneys for Plaintiff

Dated: August 21, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL HARRIS, Individually and as	:	
the Administrator of the ESTATE of	:	
QUINCY DAY-HARRIS	:	
46 Anderson Court	:	
Bear, DE 19701	:	
	Plaintiff	Docket No.:
v.	:	
	:	
CITY OF PHILADELPHIA	:	
1515 Arch Street	:	
Philadelphia, PA 19102	:	JURY TRIAL DEMANDED
	:	
and	:	
	:	
PRISON COMMISSIONER BLANCHE	:	
CARNEY	:	
Philadelphia Department of Prisons	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
WARDEN MICHELE FARRELL	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
SERGEANT JEFFREY BISHOP	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
CORRECTIONAL OFFICER JORDAN	:	
HARRIS	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	

and :
CORRECTIONAL OFFICER ANDREW :
MENDES :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CORRECTIONAL OFFICERS :
JOHN/JANE DOES (1-10) (Fictitious) :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CENTURION HEALTH :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
MHM SERVICES, INC. :
1593 Spring Hill Rd., Suite 600 :
Vienna, VA 22182 :
and :
AMY FISHER, LSW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
KYSERSTYN O'HARA, SW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
:

JILL REGALBUTO, LSW	:
a/k/a Jill Harris	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
and	:
	:
MEDICAL PROVIDERS JOHN/JANE	:
DOES (1-10) (fictitious)	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:

Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, KYERSTYN O'HARA, SW**

I, Todd A. Schoenhaus, Esquire, certify that:

X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

 expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
NANCY J. WINKLER, ESQUIRE
TODD A. SCHOENHAUS, ESQUIRE
1634 Spruce Street
Philadelphia, PA 19103
(215) 546-6636
(215) 546-3641 fax
Attorneys for Plaintiff

Dated: August 21, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL HARRIS, Individually and as	:	
the Administrator of the ESTATE of	:	
QUINCY DAY-HARRIS	:	
46 Anderson Court	:	
Bear, DE 19701	:	
	Plaintiff	Docket No.:
v.	:	
	:	
CITY OF PHILADELPHIA	:	
1515 Arch Street	:	
Philadelphia, PA 19102	:	JURY TRIAL DEMANDED
	:	
and	:	
	:	
PRISON COMMISSIONER BLANCHE	:	
CARNEY	:	
Philadelphia Department of Prisons	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
WARDEN MICHELE FARRELL	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
SERGEANT JEFFREY BISHOP	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	
and	:	
	:	
CORRECTIONAL OFFICER JORDAN	:	
HARRIS	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	
	:	

and :
CORRECTIONAL OFFICER ANDREW :
MENDES :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CORRECTIONAL OFFICERS :
JOHN/JANE DOES (1-10) (Fictitious) :
Curran-Fromhold Correctional Facility :
7901 State Road :
Philadelphia, PA 19136 :
and :
CENTURION HEALTH :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
MHM SERVICES, INC. :
1593 Spring Hill Rd., Suite 600 :
Vienna, VA 22182 :
and :
AMY FISHER, LSW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
KYSERSTYN O'HARA, SW :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
and :
:

JILL REGALBUTO, LSW	:
a/k/a Jill Harris	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
and	:
	:
MEDICAL PROVIDERS JOHN/JANE	:
DOES (1-10) (fictitious)	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:

Defendants

CERTIFICATE OF MERIT AS TO
DEFENDANT, JILL REGALBUTO, LSW A/K/A JILL HARRIS

I, Todd A. Schoenhaus, Esquire, certify that:

X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

 expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
NANCY J. WINKLER, ESQUIRE
TODD A. SCHOENHAUS, ESQUIRE
1634 Spruce Street
Philadelphia, PA 19103
(215) 546-6636
(215) 546-3641 fax
Attorneys for Plaintiff

Dated: August 21, 2023